

United States District Court  
For The Eastern District of Michigan  
Southern Division

United States of America,

Plaintiff,

Case No. 17-13199

Hon. Gershwin A. Drain

v.

One Hundred Twenty-Five Thousand  
Eighty Hundred Sixty-Five Dollars and  
Seven Cents (\$125,865.07) in U.S.  
Currency from Signature Bank Account  
#XXXXXXX6011; Ninety-Seven Thousand  
Five Hundred Thirty-Nine Dollars and  
Three Cents (\$97,539.03) in U.S.  
Currency from Signature Bank Account  
#XXXXXXX3045; Twenty-Four Thousand  
Six Hundred Sixty-Eight Dollars  
and Four Cents (\$24,668.04) in U.S.  
Currency from Signature Bank Account  
#XXXXXXX5147; Four Hundred Twenty-One  
Thousand Two Hundred Fifty-Nine Dollars  
and Twenty-Six Cents (\$421,259.26) in U.S.  
Currency from Signature Bank Account  
#XXXXXXX6003; Forty-Eight Thousand  
Seven Hundred Forty-Five Dollars and  
Thirty-Six Cents (\$48,745.36) in U.S.  
Currency from Signature Bank Account  
#XXXXXXX3157; Seven Hundred Thirteen  
Dollars and Seventy-Five Cents (\$713.75)  
in U.S. Currency from TD Bank Account  
#XXXXXXX8327; Three Hundred Seventy-  
Eight Thousand Five Hundred Fifty-Four Dollars  
and Sixty-Five Cents (\$378,554.65) in U.S.  
Currency from TD Bank Account  
#XXXXXXX7349; One Hundred Sixty-  
Five Thousand Nine Hundred Sixteen Dollars

and Ninety-Five Cents (\$165,916.95) in U.S.  
Currency from TD Bank Account  
#XXXXXXX9424; Nineteen Thousand One  
Hundred Eighty-Four Dollars  
and Ninety-Five Cents (\$19,184.95) in U.S.  
Currency from TD Bank Account  
#XXXXXXX8319; Thirteen Thousand Four  
Hundred Seventy-Nine Dollars  
and Seven Cents (\$13,479.07) in U.S.  
Currency from TD Bank Account  
#XXXXXXX7357,

Defendants *in rem*,

A1C Holdings, LLC; All American Medical  
Pharmacy, LLC; Brightsky;  
Global Healthcare Management, LLC;  
Great Lakes Medical Pharmacy, LLC;  
Keystone Choice Pharmacy, LLC;  
James Letko; Jon Letko; Livewell Holdings,  
LLC; U.S. Medical, LLC; Woods Pharmacy, LLC,

Claimants I,

Bertram Growth Capital I, L.P.;  
Bertram Growth Capital II, L.P.; Bertram  
Growth Capital II-A, L.P.

Claimants II.

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**Stipulated Order to Stay and Administratively Close Civil Forfeiture  
Proceeding**

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Plaintiff, the United States of America, by and through Matthew Schneider, United States Attorney, and Shankar Ramamurthy, Assistant United States Attorney, and Claimants I and II, by and through their respective counsels, James C. Rehnquist and Judith Germano, hereby acknowledge that there is an ongoing criminal investigation related to the allegations set forth in the civil forfeiture complaint.

The parties, therefore, stipulate to the entry of an order to stay the above-captioned civil forfeiture proceeding, pursuant to 18 U.S.C. § 981(g)(1), or alternatively, 18 U.S.C. § 9819g)(2), on the grounds that continuation of the civil proceeding may negatively impact one or several parties in the manner described in the cited statutes, and that the case be administratively closed during the pendency of the criminal investigation and related criminal proceedings, if any.

**IT IS HEREBY ORDERED:**

1. The above-captioned case is stayed until the conclusion of any related criminal investigation or subsequent criminal proceeding, pursuant to 18 U.S.C. §§ 981(g)(1) and (2), or until further order of the Court.

2. The above-captioned case shall be administratively closed for statistical purposes only, during the pendency of the criminal investigation and proceedings, if any, or until further order of the Court without prejudice to any party to seek to reopen this case.

3. That the parties shall have a reasonable time to complete discovery and to file dispositive motions if the civil forfeiture case reopens.

4. The seized assets (Defendants *in rem*) shall remain in the custody of the United States pending further order of the Court.

Respectfully submitted,

MATTHEW SCHNEIDER  
United States Attorney

s/Shankar Ramamurthy  
Shankar Ramamurthy  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, Michigan 48226  
(313) 226-9562  
shankar.ramamurthy@usdoj.gov  
(IL Bar No. 6306790)

Dated: August 15, 2018

s/ with consent of James C. Rehnquist  
James C. Rehnquist  
Attorney for Claimants I  
Goodwin Procter LLP  
100 Northern Avenue  
Boston, MA 02210  
jrehnquist@goodwinlaw.com

Dated: August 15, 2018

s/ with consent of Judith H. Germano  
Judith H. Germano  
Attorney for Claimants II  
Germano Law LLC  
460 Bloomfield Avenue, Suite 200  
Montclair, New Jersey 07042  
jgermano@germanolaw.com

Dated: August 15, 2018

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IT IS SO ORDERED.

Dated: August 17, 2018

/s/Gershwin A Drain  
HONORABLE GERSHWIN A. DRAIN  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2018, I electronically submitted the foregoing Stipulated Order to Stay and Administratively Close Civil Forfeiture Proceeding with the Clerk of the Court using the ECF Utilities system. Claimants have been served by mail and electronic mail as follows:

A1C Holdings, LLC;  
All American Medical Pharmacy,  
LLC;  
Brightsky;  
Global Healthcare Management, LLC;  
Great Lakes Medical Pharmacy, LLC;  
Keystone Choice Pharmacy, LLC;  
James Letko;  
Jon Letko;  
Livewell Holdings, LLC;  
U.S. Medical, LLC;  
Woods Pharmacy, LLC.  
c/o James C. Rehnquist  
Goodwin Procter LLP  
100 Northern Avenue  
Boston, MA 02210  
jrehnquist@goodwinlaw.com

Bertram Growth Capital I, L.P.;  
Bertram Growth Capital II, L.P.;  
Bertram Growth Capital II-A, L.P.  
c/o Judith H. Germano  
Germano Law LLC  
460 Bloomfield Avenue, Suite 200  
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s/Shankar Ramamurthy  
Assistant United States Attorney  
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